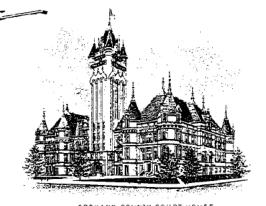
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OFFICE OF

COUNTY UTILITIES

WILLIAM R. DOBRATZ UTILITIES DIRECTOR

State of the state N. 811 JEFFERSON ST. 456-3604 SPOKANE, WASHINGTON 99260

Neil Thompson U.S. Environmental Protection Agency Park Place Building 1200 Sixth Avenue Seattle, WA

RE: HW- 113

July 10, 1990

Dear Neil,

On June 14, a meeting with Ecology and EPA was held at the County to discuss the referenced letter and the letter concerning community relations. In the County's response to EPA's letter, a statement was made that "a review of the past well analysis shows no evidence that the domestic well monitoring program has been compromised". Mike Kuntz requested that the County elaborate on this statement to explain this conclusion.

The County reviewed the lab analyses over the last ten years to search for inconsistent data. Contaminant levels showed a consistent pattern of remaining stable or steady increases or decreases. In a few cases there were unexplainable lows or highs for a particular sampling event. In most instances, these cases were resampled. We can submit copies of the last ten years' analyses for your review if you should desire.

A sampling program should not react to an anomaly but should look at trends; then the extremes may be discounted or sampled again. The concern with Colbert's program is that poor sampling techniques may have compromised the sample results. We are under the impression that if this were the case, a review of the trends would show anomalies across the entire sampling event or increased anomalies beginning at a specific sampling event. This scenario has not been evidenced in the Colbert program. Additionally, Landau and Associates reviews the residential data on a regular basis to compare it with their sampling data. This comparison has revealed no data inconsistencies.

Our conclusion of this review is that there is no indication that the data is questionable and that the program continues to provide the information required. Bruce Austin reviewed the sampling procedures with the sampling technician and a trainee, his determination was that the (b)(6) case was the only known instance



Neil Thompson July 10, 1990 Page 2

of a compromised sample. Although some of the sampling procedures may have been questionable for the period of time when a new individual was being trained (one month), we feel the problems were caught and corrected in a reasonable time to prevent any degradation to the program.

The County remains confident that the recommendations stated in the June 4, 1990, letter are the most practical approach to resolve this issue. With this letter, hopefully the agencies will have enough information to determine the Colbert domestic well sampling program is still on track. The County understands that the agencies have a responsibility to the citizens to ensure credibility of such a highly visible program. It is now time to focus our attention to the implementation of the on-going corrective measures.

If you have any questions concerning this matter please call me at 456-3604

Sincerely,

Dean Fowler Project Manager Spokane County Utilities Neil Thompson July 10, 1990 Page 2

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